

1 **STIP**
2 **BRIAN J. SMITH, ESQ.**
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8 **Attorney for MOGAVERO**

9 **UNITED STATES DISTRICT COURT**

10 **IN AND FOR THE DISTRICT OF NEVADA**

11 **UNITED STATES OF AMERICA,**)

12 **Plaintiff,**)

13 **vs.**)

14 **KELLY ANN MOGAVERO,**)

15 **Defendant.**)

Case No.: 2:15-cr-0074-JAD-NJK

**STIPULATION FOR 90-DAY
EXTENSION FOR SELF-SURRENDER**

16 *Certification:* This stipulation is filed pursuant to General Order 2007-04.

17 IT IS STIPULATED between the defendant KELLY ANN MOGAVERO through her
18 attorney BRIAN J. SMITH, ESQ. and the United States of America, through SUSAN
19 CUSHMAN, Assistant United States Attorney, that the self-surrender date of January 9,
20 2017 be extended 90 days.

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26 /s/ Brian J. Smith, Esq.
27 BRIAN J. SMITH, Esq.
28 State Bar Number 11279

ARGUMENT

1. On October 24, 2016, this Court sentenced MOGAVERO to 46 months with a self-surrender date of January 9th, 2017 at FCI Tucson.
2. Since the date of sentencing, MOGAVERO has been diagnosed with breast cancer. She is scheduled to begin treatment on January 11, 2017.
3. MOGAVERO requests a 90-day extension to allow her to begin medical treatment.
4. The Government and defense agree to the requested extension.

DATED this 5th day of January, 2016

RESPECTFULLY SUBMITTED BY:

/s/ Susan Cushman
SUSAN CUSHMAN
Assistant United States Attorney

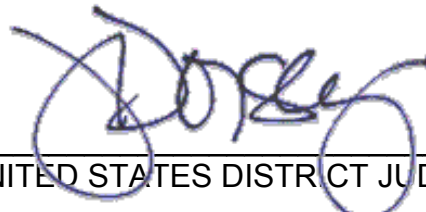
/s/ Brian Smith
BRIAN SMITH
Attorney for Defendant

ORDER

IT IS HEREBY ORDERED that the date of self-surrender be extended 90-days. Defendant shall self-surrender by no later than the 10th day of April, 2017.

DATED this 5th day of January, 2017.

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE